



HON. SYLVIA O. HINDS-RADIX  
Corporation Counsel

THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
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July 8, 2022

**VIA ECF**

Hon. Denise L. Cote  
District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *M.G. v. New York City Dep't of Educ.*, 22-cv-4844 (DLC)(SN)

Dear Judge Cote:

I am a Special Assistant Corporation Counsel in the office of the Corporation Counsel, the Hon. Sylvia O. Hinds-Radix, counsel for Defendant in the above-referenced action, wherein Plaintiff seeks solely attorneys' fees, costs, and expenses for legal services regarding an administrative hearing under the Individuals with Disabilities Education Act, 20 U.S.C. § 1400, *et seq.*, as well as for this action.

I am writing to respectfully request a 90-day extension of the time for Defendant to respond to the Complaint, from July 22, 2022 to October 20, 2022, and to adjourn the initial pre-trial conference currently scheduled for August 11, 2022 *sine die*. Plaintiff consents to these requests. This is an IDEA fees-only case and liability is not at issue. The parties hope to resolve this case without the need for conferences or motion practice and the requested extension will give the parties time to complete the City's internal review process and begin settlement negotiations. This office has successfully settled all of the many IDEA fees-only cases brought by Plaintiff's counsel in recent years (with the exception of two cases) without burdening the Court with any motion practice, and we see no reason why this case will not follow the same course.

Thank you for considering this request.

*Answer is due 10/20/22. The conference  
is adjourned sine die. Any motion  
for fees is due 10/28; opposition is*

cc: Irina Roller, Esq. (via ECF)

*due 11/18; reply is due 12/7/22.  
Denise Cote  
7/11/22*

Respectfully submitted,

Pasquale Viscusi, Esq. (PV 8588)  
Special Assistant Corporation Counsel